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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE SUBPOENA TO META PLATFORM,  
INC.,

IN CONNECTION WITH:

EVERETT BLOOM, an individual, on behalf  
of himself, the general public, and those  
similarly situated,

Plaintiff,

v.

ZUFFA, LLC,

Defendant.

Misc. Action No. \_\_\_\_\_

In connection with Case No.: 2:22-cv-00412-  
RFB-BNW (D. Nev.)

**PLAINTIFFS' NOTICE OF MOTION TO  
COMPEL NON-PARTY PRODUCTION  
AND DEPOSITION BY META  
PLATFORM, INC. PURSUANT TO  
SUBPOENA**

Date: May 30, 2023

Time: TBD

Place: TBD

1                   **NOTICE OF MOTION TO COMPEL NON-PARTY PRODUCTION**  
2                   **PURSUANT TO SUBPOENA**

3 TO THE COURT, ALL PARTIES, INTERESTED PERSONS, AND COUNSEL OF RECORD:

4           PLEASE TAKE NOTICE THAT on May 30, 2023, or at the earliest date and time to be  
5 determined by the District Judge as may be assigned by the Court (or by the Honorable Judge  
6 Richard Boulware or Honorable Magistrate Judge Brenda Weksler of the United States District  
7 Court of Nevada after transfer under F. R. Civ. P. 45(f)), Plaintiff Everett Bloom, by and through  
8 his attorneys, Gutride Safier LLP, will, and hereby does, move this Court for an order to compel  
9 the production of the documents, electronically stored information, and tangible things  
10 (collectively “Documents”) required by his Notice of Subpoena dated December 15, 2022 to  
11 Meta Platform, Inc. (“Meta”, d/b/a Facebook).

12           This motion is made pursuant to F. R. Civ. P. 34 and 45 on the grounds that (a) Plaintiff  
13 exhausted his ability to obtain the requested highly probative evidence from Zuffa LLC, (b)  
14 Plaintiff properly served a subpoena on non-party Meta to produce Documents related to the  
15 above-captioned lawsuit before the court in the District of Nevada, (c) Meta responded only with  
16 generic, boilerplate objections, and (d) Meta refused to produce the requested Documents.

17           Furthermore, pursuant to F. R. Civ. P. 37 and Civil L.R. 37, Plaintiff’s attorneys in good  
18 faith conferred with Meta, but Meta refused to produce documents even after being presented  
19 with evidence of exhaustion of discovery from defendant Zuffa LLC. As of the date of this  
20 Motion, Meta has not produced any required Document nor identified a deponent in response to  
21 the subpoena.

22           This motion is based upon this Notice of Motion, the accompanying Memorandum of  
23 Points and Authorities, the accompanying Declarations, the pleadings and files in the above-  
24 captioned action, and such other matters as may be presented at or before the hearing.  
25  
26  
27  
28

1 Dated: April 25, 2023

2 **GUTRIDE SAFIER LLP**

3 /s/Anthony J. Patek/s/

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